

MORRISON | FOERSTER LLP

250 WEST 55TH STREET  
NEW YORK, NY 10019-9601  
TELEPHONE: 212.468.8000  
FACSIMILE: 212.468.7900  
WWW.MOFO.COM

MORRISON & FOERSTER LLP  
BEIJING, BERLIN, BRUSSELS, DENVER,  
HONG KONG, LONDON, LOS ANGELES,  
NEW YORK, NORTHERN VIRGINIA,  
PALO ALTO, SACRAMENTO, SAN DIEGO,  
SAN FRANCISCO, SHANGHAI, SINGAPORE,  
TOKYO, WASHINGTON, D.C.

June 1, 2015

Writer's Direct Contact  
+1 (212) 336.4328  
JWishnew@mofo.com

By Overnight Delivery

Hon. Martin Glenn, USBJ  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 1004-1408

Re: In re Residential Capital, LLC et al.  
United States Bankruptcy Court  
Southern District of New York  
Jointly Administered Under Case No. 12-12020 (MG)

Dear Judge Glenn:

This firm is counsel to the ResCap Borrower Claims Trust (the "Trust"). In accordance with the Court's direction at the hearing on the *Objection of the ResCap Borrower Claims Trust to Claim Numbers 5610 and 5612 Filed by Richard D. Rode* [Docket No. 8452] (the "Claim Objection") held on May 14, 2015, we have spoken with Mr. Rode regarding the potential settlement of the Claim Objection. The parties are continuing to engage in settlement discussions, which have been impeded by the recent flooding in the Houston, Texas area.

Given that the parties are attempting to come to a consensual resolution, the Trust suggests that the Court delay starting to prepare its decision on the Claim Objection until the earlier of (i) June 30, 2015, or (ii) the date that the parties notify the Court that their settlement discussions are at an impasse. We will promptly alert the Court in the event a settlement is reached.

Respectfully submitted,

/s/ Jordan A. Wishnew

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Cc: Richard D. Rode (via email)